

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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<b>TOWN OF FRAMINGHAM REQUEST FOR</b>	)	
<b>DETERMINATION OF RATES APPLICABLE TO</b>	)	
<b>TRANSPORTATION AND TREATMENT OF SEWAGE</b>	)	<b>D.T.E. 02-46</b>
<b>PURSUANT TO INTERMUNICIPAL AGREEMENT</b>	)	

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**TOWN OF FRAMINGHAM'S RESPONSE TO THE SETTLEMENT  
INTERVENTION STAFF'S FIRST SET OF INFORMATION REQUESTS**

The Town of Framingham ("Framingham") responds to the Settlement Staff's First Set of Information Requests as follows.

DTE SIS-F1-1 Refer to Information Request F 1-18, Tab G. Please show how Framingham derived the 13.08 percent figure in the fourth column at the 2001 row.

**DTE 02-46: RESPONSE TO DTE SIS-F1-1:**

See the following data table. The flow information was provided by the MWRA and based upon their metering assessments.

	Average Annual Daily Flow		
	Ashland Q	Framingham Q	Total
Year	MGD	MGD	MGD
1994	0.78	8.13	8.91
1995	0.67	7.54	8.21
1996	0.83	9.63	10.46
1997	0.73	8.18	8.91
1998	0.81	8.99	9.80
1999	0.72	7.47	8.19
2000	1.10	7.08	8.18
2001	1.05	6.98	8.03
2002	1.04	6.99	8.03

To calculate Ashland's flow percentage for 2001, Framingham divided Ashland's flow (1.05 MGD) by the total flow (8.03 MGD), which results in a flow percentage of 13.08%.

This response was provided by Paul Brinkman and Steven Geribo of SEA Consulting.

DTE SIS-F1-2 Refer to Information Request F 1-18, Tab G. Please show how Framingham derived the \$257,162.91 figure shown.

**DTE 02-46: RESPONSE TO DTE-SIS-F-2:**

The figure was determined by multiplying Ashland's flow percentage (13.08%) by the Framingham O&M value of \$1,966,684. The Framingham O&M number was based upon the final numbers reported for 2001, as opposed to the estimate used in SEA's original report.

This response was provided by Paul Brinkman and Steven Geribo of SEA Consulting.

DTE SIS-F1-3 Refer to Information Requests F1-18 and F1-20. Please reconcile the difference between the figure \$2,316,814 cited in F-20 for the budgeted O&M costs against the assessment calculated in F1-18 based on an O&M figure of \$1,966,684.

**DTE 02-46: RESPONSE TO DTE SIS-F1-3:**

Table 4-1 in SEA's report was based upon preliminary budget values existing at the time of the study. The \$1,966,684 figure represents the final number reported after the close of the 2001 fiscal year.

This response was provided by Paul Brinkman and Steven Geribo of SEA Consulting.

DTE SIS-F1-4 Refer to Information Request F1-13, Tab C. Please explain whether the asset values provided are gross or net of any federal or state grant reimbursements.

**DTE 02-46: RESPONSE TO DTE SIS-F1-4:**

The asset values included in the table were developed based upon the estimated age and condition of the pipes. SEA did not use actual cost data in approximating these asset values. SEA developed the referenced asset values not to approximate the cost to Ashland of building its own system, but rather for the purpose of calculating a fair and reasonable sum to be charged to Ashland for capital buy-in under any future IMA.

Framingham has not been able to determine whether any federal or state grant monies were used in the construction of any of its pipes.

This response was provided by Paul Brinkman and Steven Geribo of SEA Consulting.

DTE SIS-F1-5 For Framingham, please provide the following information as of the end of Framingham's most recent fiscal year, or the most recent twelve-month period for which data is readily obtainable:

- a. Number of sewer customers;
- b. Rate schedules or tariffs for all classes of customers;
- c. Average bill per period by customer class (e.g. monthly, annually);
- d. Average bill per period by customer class, excluding MWRA assessments;
- e. Average flow per customer, by customer class;
- f. Average daily flow at each of the shared sewer segments provided in the response to Information Request F1-13, Tab C;
- f. Total flows by customer type; and
- g. Most current total annual sewer system budget for Framingham.

**DTE 02-46: RESPONSE TO DTE SIS-F1-5:**

- a. The Town of Framingham has approximately 19,000 sewer customer accounts.
- b. The Town of Framingham does not differentiate between customer classes. The rate schedule is developed based upon usage. A three-tiered rate system is in place and the tiers are as follows:

0-156 HCF/yr	\$3.04 per HCF (hundred cubic feet – approximately 748 gallons)
157-3,000 HCF/yr	\$4.88 per HCF
> 3,000 HCF/yr	\$6.55 per HCF

Out of town sewer customers are assigned a surcharge of \$2.50 per HCF. In the case where High Strength Waste User fees are assessed by the MWRA, these are passed on directly to the industrial user.

- c. The average bill paid by a Framingham sewer user is approximately \$500.00 per year.
- d. The average bill paid by a Framingham sewer user, exclusive of MWRA assessments, is about \$100.00 per year.
- e. The average annual sewer flow from a Framingham sewer customer is approximately 130 HCF.

- f. This data is not available for each pipe segment identified in Table 6.2. SEA developed the figures in Table 6.2, a revised copy of which is attached at Tab C to F 1-13, based upon: (1) SEA's visual observations of the flow amounts entering Framingham's system from Ashland's pipes; (2) SEA's observations as to the number of Framingham customers located in the area of those sewer line segments identified in Table 6.2; (3) SEA's knowledge as to the configuration of and flows within the sewer system; and (4) SEA's review of the MWRA's flow data.
- f. [sic] Framingham does not differentiate between customer classes. The total annual flows billed for sewer use in the Town of Framingham is about 2,500,000 HCF.
- g. The 2003 total annual sewer system budget for Framingham is \$10,583,573.

This response was provided by Paul Brinkman and Steven Geribo of SEA Consulting.

Respectfully submitted,  
THE TOWN OF FRAMINGHAM,  
By its attorneys,

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